

EXHIBIT KK

1 Scott R. Mosko (State Bar No. 106070)
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5

6 Attorneys for Defendants
7 Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra
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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SANTA CLARA

12

13 THE FACEBOOK, INC.

14 Plaintiff,
15 v.

16 CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

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18 Defendants.
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CASE NO. 105 CV 047381

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1 **PROPOUNDER PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant DIVYA NARENDRA

3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure
6 Section 2030, to the form interrogatories as follows:

7 **PREFATORY STATEMENT**

8 It should be noted that this responding party has not fully completed its investigation of the
9 facts relating to this case, has not completed discovery, and has not completed its preparation for
10 trial.

11 All of the responses contained herein are based only upon such information and documents
12 as are presently available to and specifically known to this responding party and disclose only those
13 contentions which presently occur to such responding party.

14 It is anticipated that further discovery, independent investigation, legal research, and analysis
15 will supply additional facts and add meaning to known facts, as well as establish entirely new factual
16 conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and
17 variations from the contentions herein set forth.

18 The following responses are given without prejudice to responding party's right to produce
19 evidence of any subsequently discovery fact or facts which this responding party may later recall.
20 Responding party accordingly reserves the right to change any and all answers herein as additional
21 facts are ascertained, analyses are made, legal research is completed, and contentions are made. The
22 responses contained herein are made in a good faith effort to supply as much factual information and
23 as much specification of legal contentions as are presently known, but should in no way be to the
24 prejudice of this responding party in relation to further discovery, research, or analysis.

25 **RESPONSE TO FORM INTERROGATORIES**

26 **Response to 1.1**

27 I was the only person who prepared the responses to these interrogatories.

1 | Response to 2.1

2 | Divya Narendra

3 | Response to 2.2

4 Bronx, New York

5 | Response to 2.3

6 Not applicable as there was no “unauthorized access of the Facebook’s data.”

7 | Response to 2.4

8 Not applicable as there was no “unauthorized access of the Facebook’s data.”

9 | Response to 2.5

10 (a) 16 Park Avenue, Apt 15D, New York, NY 10016

11 (b) and (c)

12 In or about 2001-through in or about 2004: Pforzheimer House, 56 Linnean Street
Cambridge, MA 02138

13 || 20

14 16 Park Avenue, Apt 15D
15 New York, NY 10016

17 In or about 2000-through in or about 2001: Holworthy Hall, Harvard Yard,
Cambridge, MA 02138

Response to 2.6

(a) Not applicable as there was no “unauthorized access of the Facebook’s data.”

Response to 2.7

1996-2000: High School Diploma: Townsend High School, 149-11 Melbourne Avenue
Flushing, NY 11367

23 2000-2004: B.A. Applied Mathematics: Harvard University, Cambridge MA 02138

24 | Response to 2.8

25

26 | Response to 2.11

27 Not applicable as there was no “unauthorized access of the Facebook’s data.”

1 **Response to 2.12**

2 Not applicable as there was no “unauthorized access of the Facebook’s data.”

3 **Response to 3.1**

4 No

5 **Response to 3.2**

6 No

7 **Response to 3.3**

8 No

9 **Response to 3.4**

10 No

11 **Response to 3.5**

12 No

13 **Response to 3.6**

14 No

15 **Response to 3.7**

16 No

17 **Response to 4.1**

18 Not applicable as there was no “unauthorized access of the Facebook’s data.”

19 **Response to 4.2**

20 Not applicable as there was no “unauthorized access of the Facebook’s data.”

21 **Response to 8.2**

22 Not applicable as there was no “unauthorized access of the Facebook’s data.”

23 **Response to 8.3**

24 Not applicable as there was no “unauthorized access of the Facebook’s data.”

25 **Response to 8.4**

26 Not applicable as there was no “unauthorized access of the Facebook’s data.”

27 **Response to 11.1**

28 Not applicable as there was no “unauthorized access of the Facebook’s data.”

1 **Response to 12.1**

2 Not applicable as there was no “unauthorized access of the Facebook’s data.”

3 **Response to 12.2**

4 Not applicable as there was no “unauthorized access of the Facebook’s data.”

5 **Response to 12.3**

6 Not applicable as there was no “unauthorized access of the Facebook’s data.”

7 **Response to 12.4**

8 Not applicable as there was no “unauthorized access of the Facebook’s data.”

9 **Response to 12.5**

10 Not applicable as there was no “unauthorized access of the Facebook’s data.”

11 **Response to 12.6**

12 Not applicable as there was no “unauthorized access of the Facebook’s data.”

13 **Response to 12.7**

14 Not applicable as there was no “unauthorized access of the Facebook’s data.”

15 **Response to 13.1**

16 Not applicable as there was no “unauthorized access of the Facebook’s data.”

17 **Response to 13.2**

18 Not applicable as there was no “unauthorized access of the Facebook’s data.”

19 **Response to 15.1**

20 No applicable. A demurrer and motion to quash was filed.

21 **Response to 16.1**

22 Not applicable as there was no “unauthorized access of the Facebook’s data.” See
23 ConnectU’s demurrer, filed on October 25, 2005.

24 **Response to 16.2**

25 Not applicable as there was no “unauthorized access of the Facebook’s data.” See
ConnectU’s demurrer, filed on October 25, 2005.

26 **Response to 16.3**

27 Not applicable as there was no “unauthorized access of the Facebook’s data.”

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1 **Response to 16.6**

2 Not applicable as there was no "unauthorized access of the Facebook's data."

3 **Response to 16.7**

4 Not applicable as there was no "unauthorized access of the Facebook's data."

5 **Response to 16.8**

6 Responding party does not understand Plaintiff is claiming property damage.

7

8 **Response to 16.9**

9 Not applicable as there was no "unauthorized access of the Facebook's data."

10 **Response to 17.1**

11 Regarding Request No. 1, Responding Party states he does not have a FACEBOOK
individual member ID.

12 Regarding Request No. 2, Responding Party visited FACEBOOK's website only in his
13 capacity as a member of ConnectU. See ConnectU's Response to Request No. 2 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 2.

14 Regarding Request No. 3, Responding Party visited FACEBOOK's website only in his
15 capacity as a member of ConnectU. See ConnectU's Response to Request No. 3 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 3.

16 Regarding Request No. 4, Responding Party visited FACEBOOK's website only in his
17 capacity as a member of ConnectU. See ConnectU's Response to Request No. 4.

18 Regarding Request No. 5, Responding Party visited FACEBOOK's website only in his
19 capacity as a member of ConnectU. See ConnectU's Response to Request No. 5.

20 Regarding Request No. 6, Responding Party visited FACEBOOK's website only in his
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 6 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 6.

22 Regarding Request No. 7, Responding Party visited FACEBOOK's website only in his
23 capacity as a member of ConnectU. See ConnectU's Response to Request No. 7.

24 Regarding Request No. 8, Responding Party activities regarding FACEBOOK's website
25 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
26 8 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 8.

27 Regarding Request No. 9, Responding Party activities regarding FACEBOOK's website
28 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
10 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 9.

29 Regarding Request No. 10, Responding Party activities regarding FACEBOOK's website
30 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 10.

1 Regarding Request No. 11, Responding Party activities regarding FACEBOOK's website
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
2 11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 11.

3 Regarding Request No. 12, Responding Party activities regarding FACEBOOK's website
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
4 12 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 12.

5 Regarding Request No. 13, Responding Party activities regarding FACEBOOK's website
6 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
6 13 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 13.

7 Regarding Request No. 14, Responding Party activities regarding FACEBOOK's website
8 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
8 14 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 14.

9 Regarding Request No. 15, Responding Party visited FACEBOOK's website only in his
10 capacity as a member of ConnectU. See ConnectU's Response to Request No. 15 and its Response
10 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 15.

11 Regarding Request No. 16, Responding Party visited FACEBOOK's website only in his
12 capacity as a member of ConnectU. See ConnectU's Response to Request No. 16.

13 Regarding Request No. 17, Responding Party visited FACEBOOK's website only in his
13 capacity as a member of ConnectU. See ConnectU's Response to Request No. 17 and its Response
14 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 17.

15 Regarding Request No. 18, Responding Party visited FACEBOOK's website only in his
15 capacity as a member of ConnectU. See ConnectU's Response to Request No. 18 and its Response
16 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 18.

17 Regarding Request No. 19, Responding Party visited FACEBOOK's website only in his
17 capacity as a member of ConnectU. See ConnectU's Response to Request No. 19 and its Response
18 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 19.

19 Regarding Request No. 20, Responding Party visited FACEBOOK's website only in his
19 capacity as a member of ConnectU. See ConnectU's Response to Request No. 20 and its Response
20 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 20.

21 Regarding Request No. 21, Responding Party visited FACEBOOK's website only in his
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 21 and its Response
22 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 21.

23 Regarding Request No. 22, Responding Party activities regarding FACEBOOK's website
23 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
24 22.

25 Regarding Request No. 23, Responding Party activities regarding FACEBOOK's website
25 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
26 23 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 23.

27 Regarding Request No. 24, Responding Party activities regarding FACEBOOK's website
27 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
28 24 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 24.

1 Regarding Request No. 25, Responding Party activities regarding FACEBOOK's website
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 25.

3 **Response to 50.3**

4 Responding party does not understand that there is an agreement alleged in the Plaintiff's
5 complaint.

6 **Response to 50.4**

7 Responding party does not understand that there is an agreement alleged in the Plaintiff's
complaint.

8 **Response to 50.5**

9 Responding party does not understand that there is an agreement alleged in the Plaintiff's
complaint.

10 **Response to 50.6**

11 Responding party does not understand that there is an agreement alleged in the Plaintiff's
12 complaint.

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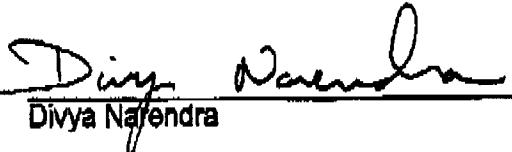
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VERIFICATION

1 2 DIVYA NARENDRA, under penalty of perjury under the laws of the State of
2 3 California, states as follows:

4 1. That he is one of the Defendants in the above-entitled action;
5 2. That he has read the foregoing RESPONSE OF DIVYA NARENDRA TO
6 FORM INTERROGATORIES and knows the contents thereof, and that the same is true of
7 his own knowledge, save and except as to the matters which are therein stated on his
8 information or belief, and as to those matters, he believes it to be true.

9 Executed on the 31 day of October, 2005, at NY, NY.

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12 13 Divya Narendra
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